


EXHIBIT B

FairLaw Firm



FairLaw Firm
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
Phone: +13052304884
Email: intake@fairlawattorney.com
Website: <https://fairlawattorney.com/>

To:
Craig Burey


Services

INVOICE

Open (Not Sent)

Invoice # 544
Invoice Date: 10/31/2023
Due Date: 11/30/2023

Amount due
14,850.55

Date	Staff Member	Category	Description	Duration	Total
2/17/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Initial intake with Mr. Burey; discuss his claim, what to expect, and review sign-up procedures (instructed to hold off on filing suit)	1.00	500.00
2/24/2023	Brian H. Pollock Esq.	Draft/revise	Drafted preservation letter to client, instructing him on what to keep and why	0.30	150.00
2/27/2023	Bridget Obando	Receipt, Review, and Analysis	Receipt, review, and organize documents sent by client.	1.00	150.00
4/7/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze 2021 SBP independent contractor agreement provided by client.	0.40	150.00
4/7/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze 2022 SBP independent contractor agreement provided by client. No arbitration clause.	0.30	112.50
4/12/2023	Brian H. Pollock Esq.	Draft/revise	Review the spreadsheet provided by Mr. Burey and the MTD filed in the Brightaupt case (to try and avoid facing the same arguments) and then revise the Complaint to address issues raised by each; then, revise the Summonses and Civil Coversheet	1.20	600.00
4/12/2023	Bridget Obando	Draft/revise	Draft summons for Nomi Health.	0.20	30.00
4/12/2023	Bridget Obando	Draft/revise	Draft Summons for SB Port Ventures.	0.20	30.00
4/12/2023	Bridget Obando	Draft/revise	Draft SBP Staffing.	0.20	30.00
4/12/2023		Paralegal	Draft summons for Trixie Belo-Osagie	0.20	30.00
4/12/2023		Paralegal	Conduct research on Sunbiz to obtain addresses at which to serve each Defendant	0.40	60.00
4/12/2023	Bridget Obando	Draft/revise	Draft Civil Cover Sheet.	0.20	30.00
4/12/2023		Paralegal	Receipt, analyze, and organize summons issued to all defendants.	0.30	45.00
4/12/2023		Paralegal	Email summons to Process Server with instructions for service.	0.10	15.00
4/12/2023		Paralegal	Organize additional information provided by client and incorporate into our file	0.30	45.00
4/13/2023	Bridget Obando	Draft/revise	Draft notice of appearance for toussaint.	0.20	30.00
4/13/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Draft letter to client to advise of the filing of the Complaint, enclosing a copy of same, and what to expect in the case. (to be sent by email to him)	0.50	250.00
4/17/2023	Ashley Hahn	Draft/revise	Draft Notice of Return of Service Nomi Health	0.20	30.00
4/20/2023	Bridget Obando	Draft/revise	Fix notice of filing return of service for Nomi Health.	0.20	30.00
4/21/2023	Ashley Hahn	Draft/revise	Draft Notice of striking NOA	0.20	30.00
4/21/2023	Bridget Obando	Draft/revise	Draft amended notice of appearance for toussaint.	0.20	30.00
4/21/2023	Bridget Obando	Paralegal	Discuss case with Ashley in regards to correcting errors in filing.	0.20	30.00
4/21/2023	Bridget Obando	Email Communication	Follow up email to process server regarding service.	0.10	15.00
	Toussaint M				

4/25/2023	Toussaint M. Cummings, Esq.	Email with Client	Read and respond to email from client.	0.20	75.00
4/25/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Brief analysis of spreadsheet of pay and job assignments provided by client.	0.20	75.00
4/28/2023	Ashley Hahn	Email with Client	Communication with client to discuss the complaint	0.20	30.00
5/1/2023	Toussaint M. Cummings, Esq.	Email with Client	Read and respond to emails from client.	0.30	112.50
5/4/2023	Toussaint M. Cummings, Esq.	Email Communication	Email exchange with process server for returns of service on SBP.	0.20	75.00
5/4/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze returns of service on SBP Staffing, SB Port and non service on Trixie.	0.30	112.50
5/4/2023	Toussaint M. Cummings, Esq.	Phone Call	Phone call with client.	0.50	187.50
5/5/2023	Toussaint M. Cummings, Esq.	Email with Client	email to client.	0.10	37.50
5/8/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze Order at ECF 10 requiring joint scheduling report.	0.10	37.50
5/8/2023	Bridget Obando	Receipt, Review, and Analysis	Go through case file and put in all expenses on case receipt and analyze all affidavits for 4 defendants.	0.50	75.00
5/8/2023		Draft/revise	Draft notice of filing the ROS for SBP Staffing.	0.20	30.00
5/8/2023		Draft/revise	Draft notice of filing the ROS for SB Port Ventures.	0.20	30.00
5/8/2023		Draft/revise	Draft notice of filing the ROS for Trixie Bela-Osagie.	0.20	30.00
5/8/2023	Bridget Obando	Receipt, Review, and Analysis	Receipt and analyze case order.	0.20	30.00
5/8/2023	Bridget Obando	Draft/revise	Draft joint scheduling report.	0.60	90.00
5/8/2023	Bridget Obando	Draft/revise	Draft proposed order.	0.30	45.00
5/12/2023	Brian H. Pollock Esq.	Document/File Management	Conduct routine file audit to determine what needs to be done and document file re: same	0.30	150.00
5/12/2023	Bridget Obando	Draft/revise	Draft certificate of interested parties.	0.30	45.00
5/16/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze Order Requiring Combined Responses at ECF 13.	0.10	37.50
5/16/2023	Toussaint M. Cummings, Esq.	Email Communication	Email to process server to attempt service on Trixie at different address.	0.10	37.50
5/16/2023	Brian H. Pollock Esq.	Draft/revise	Begin drafting rule 26 disclosures.	0.30	150.00
5/17/2023	Toussaint M. Cummings, Esq.	Phone Call	Phone call with Steve, process server.	0.20	75.00
5/21/2023	Toussaint M. Cummings,	Receipt, Review, and Analysis	Analyze paperless order at ECF15 granting motion for extension of time to file scheduling report.	0.10	37.50

5/22/2023	Bridget Obando	Receipt, Review, and Analysis	Conduct file audit and clear tasks.	0.20	30.00
5/22/2023	Bridget Obando	Email Communication	Email exchange with arbitrator.	0.20	30.00
5/23/2023	Toussaint M. Cummings, Esq.	Phone Call	Phone call with opposing counsel Fabian Ruiz re: extension of time to respond to complaint.	0.20	75.00
5/23/2023	Toussaint M. Cummings, Esq.	Email Communication	Read and respond to email from Fabian Ruiz re extension of time to respond.	0.20	75.00
5/24/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze paperless order at ECF 17 denying SBP's motion for extension of time to respond to complaint.	0.10	37.50
5/24/2023	Toussaint M. Cummings, Esq.	Email Communication	Email to opposing counsel re order denying motion for extension of time.	0.10	37.50
6/2/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze order to perfect service on Belo Osagie at ECF 19.	0.10	37.50
6/5/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze client's financial documents to calculate claim for damages.	1.40	525.00
6/5/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Calculate damages based on financial documents.	0.40	150.00
6/5/2023	Toussaint M. Cummings, Esq.	Email with Client	Email to client.	0.30	112.50
6/6/2023	Toussaint M. Cummings, Esq.	Email with Client	Read and respond to email from client.	0.40	150.00
6/6/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze time sheets of client's work schedule for 2022 and 2023.	0.90	337.50
6/6/2023	Toussaint M. Cummings, Esq.	Phone Call	Phone call to Marlene Quintana.	0.10	37.50
6/6/2023	Bridget Obando	Email Communication	Email to Steve regarding service.	0.10	15.00
6/6/2023	Bridget Obando	Receipt, Review, and Analysis	Bates stamp all documents to turn over for demand letter.	0.60	90.00
6/7/2023	Toussaint M. Cummings, Esq.	Email Communication	Send demand to defendants.	0.30	112.50
8/7/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Review file to determine future needs; then, draft written memo re: same	0.20	100.00
8/7/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Receipt and review of SBP and SB Port's Answer and (13) Affirmative Defenses	1.00	500.00
8/9/2023	Steffany Sanguino	Paralegal	Drafted the Join Schedule Report and Proposed Scheduling Order	0.70	115.50
8/11/2023	Steffany Sanguino	Paralegal	The joint Scheduling Report and Proposed Schedule were emailed to OCs'.	0.10	16.50

8/21/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Exchange emails re: the proposed Joint Scheduling Report and proposed schedule including holding depositions in person and then have a conference call to discuss and agree upon the documents to be submitted to the Court	1.30	650.00
8/22/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of the Court's Order in Actions Brought Under The FLSA	0.20	100.00
8/23/2023	Steffany Sanguino	Paralegal	I put a timesheet together for the overtime the client is owed.	1.03	169.95
8/23/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Receipt and review of Paperless Order RE: Procedures to Set Settlement Conference	0.20	100.00
8/24/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Receipt and review of Order Setting Jury Trial	0.40	200.00
8/24/2023	Steffany Sanguino	Paralegal	I emailed the client requesting his witnesses and approval on the amount we gathered based on what he is owed for overtime.	0.10	16.50
8/25/2023	Toussaint M. Cummings, Esq.	Draft/revise	draft N/Dissociation of Counsel	0.20	75.00
8/28/2023	Steffany Sanguino	Paralegal	I called the client to f.u with his approval on the overtime spreadsheet and his witnesses. no. a left a v.m	0.10	16.50
8/28/2023	Steffany Sanguino	Paralegal	Drafted the statement of claim.	0.40	66.00
8/28/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Revise the proposed Statement of Claim for Mr. Burey	0.30	150.00
8/29/2023	Steffany Sanguino	Paralegal	Revise and file the Statement of Claim with the Overtime Worksheet (and modify same to be accepted by the court).	0.30	49.50
8/29/2023	Steffany Sanguino	Paralegal	Certificate of Interested Parties has been drafted	0.40	66.00
8/29/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Revise and approve the proposed Certificate of Interested Parties	0.20	100.00
8/29/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Revise and finalize the proposed Statement of Claim for Mr. Burey	0.20	100.00
8/30/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Receipt and review of email from Mr. Ruiz conveying offer of \$----, considering Mr. Burey's claim and the fees/costs incurred	0.10	50.00
8/31/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Review file and compile additional documents to be shared with defense counsel as supportive of our Statement of Claim after analyzing the significant amount of documentation and materials that Mr. Burey has in relation to the issue of control	0.70	350.00
8/31/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Draft email to Mr. Ruiz responding to the offer and basis for same - which included Mr. Burey working as both a 1099 and W-2 employee while performing the same job duties, with the only difference being his employment classification	0.20	100.00
9/1/2023	Steffany Sanguino	Paralegal	Combined and bated stamped the responsive documents, created a Dropbox link with a password, and provided it to OCs'. Notice of Compliance has been drafted and filed.	1.50	247.50
9/6/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Exchange multiple emails with Mr. Burey re: our evaluation of his case and basis for same, his requests for clarification and the additional information provided, our responses, his thoughts on potential defense issues, and settlement negotiations	1.10	550.00
9/8/2023	Brian H. Pollock Esq.	Teleconference with	T/c with Mr. McKinley re: the potential to resolve Mr. Burey's case and particulars for same	0.30	150.00
9/21/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Review and then revise the proposed Settlement Agreement and then respond with email enclosing same	1.00	500.00
			Phone call with client regarding upcoming deposition (in		

Case 1:23-cv-21378-RAR Document 41-2 Entered on FLSD Docket 11/01/2023 Page 7 of 8

10/2/2023	Luna Alvey Esq.	Phone Call	Brightaupt case) to discuss the significance of the settlement agreement and whether we can and cannot discuss as related to the settlement of our (this) case	0.60	240.00
10/4/2023	Luna Alvey Esq.	Phone Call	Phone call with client regarding deposition (in Brightaupt case)	0.20	80.00
10/4/2023	Luna Alvey Esq.	Attendance at	Attendance at Craig Burey's deposition (in Brightaupt case) to ensure he did not violate the confidentiality terms of the settlement agreement for this/our case	4.30	1,720.00
10/9/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Exchange emails with Mr. Ruiz re: status of the fully executed settlement agreement	0.20	100.00
10/11/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Receipt of proposed M/In Camera Inspection and Order Granting	0.30	150.00
10/11/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Draft proposed Joint Motion to Approve and proposed Order Granting and email same to Mr. McKinley with my proposed revision for how to handle the approval process; then, speak with him re: same	1.20	600.00
10/11/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Finalize the proposed Motion to Approve, Order, and draft email to Judge Ruiz enclosing the proposed Orders	0.30	150.00
10/13/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Receipt of Order Denying M/Settlement Approval and t/c with Mr. McKinley re: same	0.40	200.00
10/17/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Revise the proposed Settlement Agreement to remove the non-disparagement provisions and then t/c with Mr. Ruiz to discuss same before circulating email enclosing the Revised Settlement Agreement	0.70	350.00
10/27/2023	Brian H. Pollock Esq.	FLSA - Plaintiff	Review of the proposed, revised Settlement Agreement and Renewed M/Approve and t/c with Mr. McKinley re: same	0.50	250.00

Services Subtotal: 14,258.95

Expenses

Date	Vendor	Category	Description	Total
4/12/2023	FairLaw Firm	Filing Fee - Federal Court	Complaint filed in Federal court.	402.00
5/8/2023	FairLaw Firm	Affidavit of Service	Return of service for SB Port Ventures #2023000738 Miami PSPI.	47.40
5/8/2023	FairLaw Firm	Affidavit of Service	Return of service for SBP Staffing & Recruiting #2023000737 Miami PSPI.	47.40
5/8/2023	FairLaw Firm	Affidavit of Service	Return of service for Trixie #2023000739 Miami PSPI.	47.40
5/8/2023	FairLaw Firm	Affidavit of Service	Return of service for Nomi Health #2023000736 Miami PSPI.	47.40

Expenses Subtotal: 591.60

Notes:

Total: 14,850.55

Please make all amounts payable to: FairLaw Firm. Tax ID No.: 20-1722656.

Payment is due upon receipt.

Thank you for your business.



balance of any non-refundable retainer held in the firm's operating account. After that non-refundable retainer is exhausted, FairLaw Firm will then pay any remaining balance on this invoice with the funds held in FairLaw Firm's IOTA Trust Account. Any remaining invoice balance that cannot be satisfied by funds deposited with the firm must to be paid within 7 days from the date of this. **The failure to timely pay each invoice will result in the remaining balance on this invoice accruing interest at a rate of 18% per annum plus payment of our attorneys' fees and costs incurred in collection of this invoice.**